

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Mail Processing Network Rationalization
Service Changes, 2012

Docket No. N2012-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO,
MOTION FOR ACCESS TO
NON-PUBLIC INFORMATION IDENTIFIED
AS USPS-LR-N2012-1/NP1, NP6, NP7, NP8 and NP12
(February 14, 2012)

Pursuant to 39 CFR 3007.40 and Rule 21 of the Commission's Rules of Practice and Procedure, the American Postal Workers Union, AFL-CIO (APWU) hereby moves for access to certain Postal Service materials filed in the non-public annex of this docket.

APWU seeks access to the following non-public Library References:

- USPS-LR-N2012-1/NP1 Market Research Materials; and
- USPS-LR-N2012-1/NP6 Calculating Air Transportation Cost Change; and
- USPS-LR-N2012-1/NP7, Material Supporting Responses of Postal Service Witness Martin to Interrogatories of the Public Representative (PR/USPS-T6-7, 8 and 10); and
- USPS-LR-N2012-1/NP8, excerpted material from 14 AMP studies; and
- USPS-LR-N2012-1/NP12 USPS AMP Studies (2008-2011).

Recently APWU engaged Shorter Cycles, LLC to act as a consultant on this case with an eye towards preparing rebuttal testimony. Shorter Cycles is a unique targeted business development and sales cycle engineering firm that specializes in helping businesses to elevate market position and optimize value propositions. Shorter Cycles has been engaged to assist APWU in market analysis and understanding the Postal Service market research at issue in this case. Specifically relevant to the potential

rebuttal is the testimony of USPS witnesses Greg Whiteman (USPS-T12) and Rebecca Elmore-Yalch (USPS-T11) and their associated interrogatory responses, library references and other information relevant to their market research and potential impacts of the Postal Service's proposal.

The Postal Service submitted Library References USPS-LR-N2012-1/NP1 and USPS-LR-N2012-1/NP6, as part of its initial case filing with the Commission initiating this docket on December 5, 2011. APWU filed a motion to access this material on December 8, 2011.

The Postal Service submitted Library Reference USPS-LR-N2012-1/NP7 on January 6, 2012 and APWU filed a motion to access this material on January 13, 2012 and another motion to access this material for additional APWU consultants on January 19, 2012.

The Postal Service submitted Library Reference USPS-LR-N2012-1/NP8 on January 12, 2012 and APWU filed a motion to access this material on January 13, 2012 and another motion to access this material for an additional APWU representative on January 17, 2012.

The Postal Service submitted Library Reference USPS-LR-N2012-1/NP12 on January 31, 2012 and APWU filed a motion to access this material on February 9, 2012.

The Commission granted each of the above referenced Motions without objection from the Postal Service. See POR No. N2012-1/1 (December 14, 2011); POR No. N2012-1/7 (January 20, 2012); and POR No. N2012-1/12 (February 10, 2012).

APWU will utilize Shorter Cycles to assist in preparing well-developed and targeted discovery requests to help build a robust record in this case. Therefore, APWU requests that certain Shorter Cycles representatives be granted immediate access to the Library References USPS-LR-N2012-1/NP1, NP6, NP7, NP8, and NP12.

In accordance with 39 CFR 3007.40(b), the following APWU consultants have completed a Statement of Compliance with Protective Conditions Certification, found in Appendix A to Part 3007 of Title 39 of the Code of Federal Regulations, for Library References USPS-LR-N2012-1/NP1, NP6, NP7, NP8 and NP12:

Marc Schiller¹
Shorter Cycles
Principal
APWU Consultant

Gordon Summer
Shorter Cycles
Principal
APWU Consultant

Sheppard Vars
Shorter Cycles
Senior Consultant
APWU Consultant

A copy of each Certification is attached hereto. The original Certifications will be promptly filed with the Commission. Persons identified by the Postal Service pursuant to Section 3007.2(c) have also been provided with a copy of this Motion and accompanying certifications today by email.

Conclusion

For the forgoing reasons, APWU respectfully requests that access to Library References USPS-LR-N2021-1/NP1, NP6, NP7, NP8, and NP12 be granted to the above named individuals as set forth in this Motion.

Respectfully submitted,

Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

¹ Mr. Schiller is also associated with Decision Analysis Partners and has already been granted access to USPS-LR-N2012-1/NP7 and NP12.

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP1** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Marc Schiller

Firm

Shor ter Cycles

Title

Principal

Representing

APWU

Signature

John A. San

Date

2/13/2012

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP6** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Marc Schiller

Firm

Shorster Cycles

Title

Principal

Representing

ADWU

Signature

John A. Sca

Date

2/13/2012

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP7** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Marc Schiller

Firm

Shorter Cycles

Title

Principal

Representing

ADWU

Signature



Date

2/13/2012

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP8** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Marc Schiller

Firm

Shorster Cycles

Title

Principal

Representing

ADWU

Signature

John A. Schiller

Date

2/13/2012

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP12** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Marc Schiller

Firm

Sharter Cycles

Title

Principal

Representing

APWA

Signature

John A. Sauer


Date

2/13/2012

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP1** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name	<u>Gordon Sumner, PhD</u>
Firm	<u>Shawen Cycles</u>
Title	<u>PARTNER</u>
Representing	<u>APWU</u>
Signature	<u></u>
Date	<u>14 FEB 12</u>

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP6** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Gordon Summer, PhD

Firm

Shasta Cyber

Title

Partner

Representing

APWA

Signature

[Signature]

Date

14 FEB 12

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP7** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Garson Sumner, Ph.D.

Firm

Shawer Cycles


Title

PARTNER

Representing

APWU

Signature



Date

14 Feb 12

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP8** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Gordon Sumner, Ph.D.

Firm

Shonette Cycles

Title

Partner

Representing

APWA

Signature

[Signature]

Date

19 Feb 12

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP12** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Ernest Sumner PhD

Firm

Shurtin Cycles

Title

Partner

Representing

APWA

Signature

[Signature]

Date

14 FEB 12

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP1** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Sheppard Vars

Firm

Shorter Cycles LLC

Title

Sr. Consultant

Representing

APWU

Signature

Sheppard Vars

Date

February 13, 2012

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP6** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Sheppard Vars

Firm

Shorter Cycles LLC

Title

Sr. Consultant

Representing

APWU

Signature

Sheppard Vars

Date

February 14, 2012

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP7** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Sheppard Vars

Firm

Shorter Cycles LLC

Title

Sr Consultant

Representing

APWU

Signature

Sheppard Vars

Date

February 14, 2012

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP8** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Sheppard Vars

Firm

Shorter Cycles

Title

Sr. Consultant

Representing

APWU

Signature

Sheppard Vars

Date

February 14, 2012

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP12** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Sheppard Vars

Firm

Shorter Cycles LLC

Title

Sr. Consultant

Representing

APWU

Signature

Sheppard Vars

Date

February 14, 2012